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**IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PA
CIVIL ACTION-LAW**

PRESTIGE FUND A, LLC, ET AL., : No. CI-24-06012
Plaintiffs, :
v. : Hon. Leonard G. Brown, III
: :
PARAMOUNT MANAGEMENT GROUP, :
LLC, :
Defendant. :
:

**PLAINTIFFS' INTERROGATORIES IN AID OF EXECUTION
DIRECTED TO DEFENDANT**

Plaintiffs hereby request that Defendant answer the following interrogatories under oath within thirty (30) days of service thereof in accordance with Pennsylvania Rules of Civil Procedure 3117, 4005, and 4006.

DEFINITIONS AND GENERAL INSTRUCTIONS

1. “Asset” means any property or thing of value you owned, claimed, or held any interest in, in whole or in part, including any and all real property, tangible personal property including cash, vehicles, aircraft, boats or other water vessels, goods, inventory, machinery, equipment, trade fixtures, office equipment, supplies, and computer systems and networks, and intangible personal property including good will, contracts, accounts receivable, notes receivable, stocks, bonds,

and other securities, ownership interest in any other entities such as subsidiary corporations, general or limited partnerships, and joint ventures, intellectual property rights including copyrights, patents, trademarks, and trade names, and insurance policies which you own or which name you as an insured.

2. "Communications" means all statements, admissions, denials, inquiries, discussions, conversations, negotiations, agreements, contracts, understandings, meetings, telephone conversations, letters, correspondence, notes, telegrams, telexes, e-mails, texts, advertisements, or any other form of written or verbal intercourse.

3. "Date" shall mean the exact day, month, and year, if ascertainable, or if not, the best approximation thereof, including relationship to other event.

4. "Defendant," "Paramount," "you" and "your" shall refer to Paramount Management Group, LLC and its agents, officers, directors, employees, attorneys, accountants, assignees, and all other persons acting on its behalf.

5. "Describe", "explain" and "state" mean to detail fully by reference to underlying facts, rather than to ultimate facts or conclusions of fact or law, and to particularize as to time, place, and manner.

6. "Document" means the original and all copies of any written, printed, typed, electronic or other graphic matter of any kind or nature, in hard copy or machine readable form, and any other tangible thing in your possession, custody or control, wherever located. Any copy containing thereon or having attached thereto, any alterations, notes, comments, or other material not included in the originals or

copies referred to in the preceding sentence shall be deemed a separate document within the foregoing definition. The term "documents" includes but it is not limited to:

- a. all contracts, agreements, letter agreements, representations, warranties, certificates, and opinions;
- b. all letters or other forms of communications or communication, including envelopes and notes, telegrams, cables, facsimiles, e-mails, texts, telex messages and other messages, including reports, notes, notations, and memoranda of or relating to telephone conversations or conferences;
- c. all memoranda, reports, test results, financial statements or reports, notes, scripts, transcripts, tabulations, studies, analyses, evaluations, projections, work papers, corporate records, or copies thereof, expressions or statements of policy, lists, comparisons, questionnaires, surveys, charts, graphs, summaries, extracts, statistical statements or records, compilations and opinions or reports of consultants;
- d. all desk calendars, appointment books and diaries;
- e. all minutes, records or transcripts of meetings and conferences and lists of persons attending meetings or conferences;
- f. all reports and summaries of interviews and negotiations;

- g. all books, articles, press releases, magazines, newspapers, booklets, brochures, pamphlets, circulars, bulletins, notices, instructions, and manuals;
- h. all motion pictures and photographs (whether developed or undeveloped), tape recordings, microfilms, phonographs, tapes or other records, punch cards, magnetic tapes, discs, backup tapes, data cells, drums, printouts, and other data compilations from which information can be obtained;
- i. all drafts of any document, revisions of drafts of any document and original or preliminary notes; and
- j. all electronically stored information.

This definition shall not be construed in any way to limit or constrict the definition of “document” contained in the Pennsylvania Rules of Civil Procedure.

7. “Each” includes the word “every,” and “every” includes the word “each.” “Any” includes the word “all,” and “all” includes the word “any.” “And” includes the word “or,” and “or” includes the word “and.”

8. “Funds” shall refer to Prestige Fund A, LLC; Prestige Fund A II, LLC; Prestige Fund A IV, LLC; Prestige Fund A V, LLC; Prestige Fund A VI, LLC; Prestige Fund A VII, LLC; Prestige Fund A IX, LLC; Prestige Fund B, LLC; Prestige Fund B II, LLC; Prestige Fund B IV, LLC; Prestige Fund B V, LLC; Prestige Fund B VI, LLC; Prestige Fund B VII, LLC; Prestige Fund B BTM I, LLC; Prestige Fund D, LLC; Prestige Fund D III, LLC; Prestige Fund D IV, LLC;

Prestige Fund D V, LLC; Prestige Fund D VI, LLC; Prestige Fund D BTM I, LLC; WF Velocity I, LLC; WF Velocity Fund IV, LLC; WF Velocity Fund V, LLC; WF Velocity Fund VI, LLC; and WF Velocity Fund VII, LLC.

9. "Fund" shall refer to any of the Funds individually.

10. "MSA" refers to a Management Services Agreement.

11. "Refer to," "referring to," "relate to," "relating to," or "evidencing" shall mean, without limitation, referring to, relating to, evidencing, demonstrating, concerning, involving, constituting, or discussing.

12. "Revenue" or "Income" means any and all money, earnings, revenue, or payments of any kind that you received in any form, whether in cash or by check, credit or debit card, electronic transfer, or otherwise, including but not limited to payments for goods and services, payments on accounts receivable, loan repayments, interest income, rents, royalties, license fees, commissions, dividends, distributions, payments relating to sales of assets, equipment, or inventory, payments on contracts, or any other payment or remuneration you received in connection with the operation of your business.

13. Terms in the plural include the singular, and terms in the singular include the plural.

14. The masculine form of any noun or pronoun includes the feminine and neuter form.

15. In answering these interrogatories, furnish all information available to you, including information in the possession of your attorneys, investigators,

employees, or agents and all other persons acting on your behalf and not merely such information that is within your personal knowledge.

16. If you or your attorneys cannot answer the interrogatories in full after exercising due diligence to secure the information requested, so state and answer to the extent possible, specifying the inability to answer the remainder and stating whatever information or knowledge you and/or your attorneys have concerning the unanswered portions. You and/or your attorneys are required to supplement any response to these interrogatories as necessary.

17. In each interrogatory wherein you and/or your attorneys are asked to "identify" a person, state the following information with respect to each such person:

- a. Name;
- b. Last known address and telephone number;
- c. Last known business address and telephone number; and
- d. Job title.

18. In each interrogatory wherein you and/or your attorneys are asked to "identify" and/or "describe" any document, state with respect to each such document either the Bates/production number or the:

- a. Date of the document;
- b. Person originating the document;
- c. Present location of the document;
- d. Person in whose possession or under whose control the document presently is and the relationship of this person to you, if any; and

e. The contents or substance of the document.

19. If any document specified herein can be identified but is no longer in the possession or control of you and/or your attorneys, identify the document by describing its substance and stating the date on which it was created, the names of any and all persons involved in creating it, the present location of the document, and the names and addresses of any and all persons who currently possess the document. If the document was lost, destroyed, or transferred voluntarily or involuntarily to others, please so state. In each instance, state the document's date of creation, subject matter in detail, author, the date of the document's loss, destruction, or transfer and the reason for its loss, destruction, or transfer. Unless expressly notified otherwise in writing, Defendants will assume the failure to produce any documents requested herein means that such items do not exist.

20. If you claim a privilege with regard to any document responsive to an interrogatory herein, state the following in a privilege log:

- a. The nature of the privilege claimed;
- b. The person who created or originated the document;
- c. All recipients of the document;
- d. The present location of the document;
- e. The subject matter of the document in sufficient detail to permit Defendants to file a motion to compel production, if appropriate; and
- f. the person in whose possession or under whose control the document presently is and the relationship of this person to Plaintiffs, if any.

21. If you claim a privilege with regard to any information responsive to an interrogatory herein, state the following:

- a. The nature of the privilege claimed;
- b. The person in possession of such information; and
- c. The nature and substance of such information.

22. If you encounter any ambiguity in construing an interrogatory, definition, or instruction, state the matter deemed "ambiguous" and set forth the construction used in responding.

23. These Definitions and General Instructions shall not in any way be construed to limit your obligations to answer these interrogatories under the Pennsylvania Rules of Civil Procedure.

24. These interrogatories are continuing, and in the event that your answers become incomplete or inaccurate, you are under a continuing obligation to supplement your answers.

25. Unless otherwise stated, the relevant time period for these interrogatories is January 1, 2024 to the date of your response.

INTERROGATORIES

1. Identify the individual(s) answering these interrogatories. Include in your answer the individual's title, job description, responsibilities, and length of employment, and state whether the individual is acting as an agent of Paramount in responding to these Interrogatories.

ANSWER Daryl Heller

2. Identify and produce any documents you relied on in answering these interrogatories.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

3. Identify and describe all of your affiliates, subsidiaries, parent companies, or any other company that has or claims an interest in Paramount, including the name, address or location, and state or country of incorporation organization of any such entity, and the nature of your affiliation or corporate or other organizational relationship with any such entity.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

4. Identify all corporations, subsidiaries, limited liability companies, trusts, partnerships, or other business entity of any kind or nature in which you currently own, hold, or claim an interest in, in whole or in part, or owned, held, or claimed an interest in, in whole or in part, during the relevant time period, and describe that relationship.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

5. Identify all members of Paramount.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

6. For the period of January 1, 2023 to March 31, 2024, identify all financial institutions used by Paramount to pay any Monthly Revenue Remittance to the Funds. Identify the account number for each.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

7. For the period of April 1, 2024 to the date of your response to this interrogatory, identify all financial institutions where Paramount deposited revenues generated by ATMs owned by the Funds. Identify the account number for each.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

8. For the period of April 1, 2024 to the date of your response to this interrogatory, identify all persons or entities that had access to the financial account containing revenues generated by ATMs owned by the Funds.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

9. For the period of April 1, 2024 to the date of your response to this interrogatory, identify the recipient of any funds from the financial account containing revenues generated by ATMs owned by the Funds, including the date and amount the funds were received and the purpose of the transfer.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

10. As of the date of your response to this interrogatory, identity the total amount of cash in all financial accounts that are accessible to Paramount or any entity owned or controlled, directly or indirectly by Paramount.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

11. Identify any recorded liens or judgments against Paramount since January 1, 2023, including the amount. State whether any recorded lien or judgment has been satisfied and if so, when.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

12. Identify any recorded liens or judgments against any entity owned or controlled, directly or indirectly, by Paramount since January 1, 2023, including the amount. State whether said recorded lien has been satisfied and if so, when.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

13. Identify all cell phone numbers used by Daryl Heller to communicate on behalf of Paramount. **ANSWER** On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

14. Identify all email addresses used by Daryl Heller to communicate on behalf of Paramount

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

15. Provide all of the following information regarding each of the Funds' ATM Units:

- i. ATM TID;
 1. Which Fund the ATM Belongs To;
- ii. Location Name;
 1. Contact Name;
 2. Physical Address;
 3. Physical City;
 4. Physical State;
 5. Physical Zip;
 6. Physical Phone;
 7. Mailing Address;
 8. Mailing City;
 9. Mailing State;
 10. Mailing ZIP;
 11. Mailing Phone;

12. Locations Revenue Split;
13. Whether Split is Daily or Monthly;
14. Last Date Paid;
- iii. Processor;
- iv. Sponsoring Bank;
- v. Cash Supplier;
 1. Contact;
 2. Address;
 3. City;
 4. State;
 5. Zip;
 6. Phone;
 7. Billing Type (per transaction or interest);
- vi. Cash In Transit;
 1. Contact;
 2. Address;
 3. City;
 4. State;
 5. Zip;
 6. Phone;
 7. Billing Type (per transaction or per delivery);
- vii. 1st Line Maintenance Provider;
 1. Contact;
 2. Address;

3. City;
4. State;
5. Zip;
6. Phone;
7. Billing Type (per transaction, monthly or per occurrence);

viii. 2nd Line Maintenance Provider;

1. Contact;
2. Address;
3. City;
4. State;
5. Zip;
6. Phone;
7. Billing Type (per transaction, monthly or per occurrence);

ix. Portfolio Acquired From;

1. Contact;
2. Address;
3. City;
4. State;
5. Zip;
6. Phone;

x. ATM Make;

xi. ATM Model;

xii. Serial Number;

xiii. Date Installed;

- xiv. ATM Password; and
- xv. Last Transaction Date.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

16. Identify all persons or entities to whom Fund assets have been pledged by you as collateral. Provide the dates of any such pledge and identify the instruments through which any such pledge was made.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

17. For the relevant time period, describe how Paramount used revenue generated by the ATMs subject to the MSAs between the Funds and Paramount.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

18. If Paramount has used revenue generated by the ATMs subject to the MSAs between the Funds and Paramount for the benefit of Paramount's member(s) or subsidiaries, then describe the basis for such use and the circumstances surrounding such use.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

19. For the period of April 1, 2024 to the date of your response to this interrogatory, describe what happened to the revenue generated by the ATMs subject to the MSAs between the Funds and Paramount.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

20. Identify and describe your revenue during the relevant time period, including but not limited to:

- (a) All sources of income, revenue, or remuneration of any kind, including payments for goods and services, interest income, operating income, payments on accounts receivables, commissions, agency fees, loan repayments, rents, royalties, license fees, dividends, distributions, payments relating to sales of assets, equipment, or inventory, payments on contracts, or any other payment or remuneration you received in connection with the operation of your business.
- (b) Income declared on state and federal income tax returns, and all related forms and schedules (including all amended returns, forms, and schedules) filed during or relating to the relevant time period.
- (c) Income identified on financial statements, balance sheets, income statements, cash flow statements, and loan applications prepared or submitted by you or on your behalf during the relevant time period.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

21. Identify and produce all documents evidencing your revenue referenced in foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

22. Identify and describe your routine expenses, including but not limited to:

- (a) Operating costs.
- (b) Rental obligations.
- (c) Payroll and benefits.
- (d) Outstanding loans.
- (e) Installment payments.
- (f) Mortgage payments.
- (g) Loan payments and financing charges on vehicles, boats, aircraft, equipment, and supplies.
- (h) Payments due under contracts.
- (i) Royalty payments and license fees.
- (j) Commissions owed to brokers, dealers, or representatives.
- (k) Legal, accounting, and other professional fees.
- (l) Advertising and marketing costs.
- (m) Other routine debts and expenses that occur on a regular basis.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

23. Identify and produce all documents evidencing your routine expenses referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

24. Identify and describe all debts and liabilities you owed or incurred during the relevant time period, including:

- (a) The name, address, and telephone number of the creditor.
- (b) The amount owed.
- (c) When the debt was incurred and for what reason.
- (d) Whether all or any portion of the debt is paid.
- (e) When all or any portion was paid.
- (f) Whether the debt is secured and, if so, how it is secured.
- (g) Any remaining balance on all such debts.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

25. Identify and produce all documents evidencing your debts and liabilities referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

26. Identify all efforts to collect any debt from you by any creditor, collection agency, attorney, or other party acting on behalf of any creditor, including receiving demand letters, default notices, forbearance agreements, collection letters, liens, *lis pendens*, lawsuits, judgments, petitions, complaints, summonses, or other legal process.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

27. Identify all legal actions in which you have been or are a party during the relevant time period, including:

- (a) The title of the case.
- (b) The name of the court where the action is or was pending.
- (c) The docket number of the case.
- (d) A description of the case.
- (e) The outcome of the case, if applicable (for example, a judgment for money damages against you or the other party).

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

28. Identify all individuals, institutions, and other entities that owe you debts or liabilities, including:

- (a) The name, address, and telephone number of the debtor.
- (b) The amount of the debt or liability as of the date of your response to this interrogatory.
- (c) Whether the debt is secured, and if so, how.
- (d) The maturity date of the debt.
- (e) Whether any debt has become uncollectable.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

29. Identify and produce all documents evidencing all debts and liabilities owed to you, as referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

30. Identify and describe all real property you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any interest in, directly or indirectly, in whole or in part, during the relevant time period, including:

- (a) The property's address.
- (b) The purchase price.
- (c) The current fair market value.
- (d) The type of real property.
- (e) How the property is currently titled.
- (f) How the property was titled when first purchased.
- (g) Your interest in the property.
- (h) The identity of any third parties who possess or claim to possess an ownership interest in the property.
- (i) Any debts, liabilities, liens, or other encumbrances against the property.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

31. Identify and produce all documents evidencing your interest in real property, referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

32. Identify all banks, brokerage firms, investment firms, or other financial institutions for any account which you currently own, hold, or claim an interest in, in whole or in part, or owned, held, or claimed an interest in, in whole or in part, during the relevant time period, including:

- (a) The bank, investment firm, or other financial institution name, address, and telephone number.
- (b) The name under which the account is titled.
- (c) The account number.
- (d) The account type.
- (e) The account balance as November 21, 2024.
- (f) The identity of any third parties who possess or claim to possess an ownership interest in the property.
- (g) Any debts, liabilities, liens, or other encumbrances against the accounts.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

33. Identify and produce all documents evidencing your interest in any accounts at banks, brokerage firms, investment firms, or other financial institutions, referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

34. Identify and describe all vehicles, aircraft, boats, or other water vessels you currently own, hold, or claim an interest in, directly or indirectly, in whole or in part, or owned, held, or claimed an interest in, directly or indirectly, in whole or in part, during the relevant time period, including:

- (a) The property's current location.
- (b) The property's purchase price.
- (c) The current fair market value.
- (d) The type of property.
- (e) How you acquired an ownership interest or claim in the property.
- (f) Your current ownership interest or claim in the property.
- (g) The identity of any third parties who possess or claim to possess an ownership interest in the property.
- (h) Any debts, liabilities, liens, or other encumbrances against the property.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

35. Identify and produce all documents evidencing your interest in any vehicles, aircraft, boats, or other water vessels, referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

36. Identify and describe any and all other tangible corporate property with a value over \$100 which you currently own, hold, or claim an interest in, directly or indirectly, in whole or in part, or owned, held, or claimed an interest in, directly or indirectly, in whole or in part, during the relevant time period, including:

- (a) The type of property, including, but not limited to:
 - i. Goods.
 - ii. Equipment and machinery.
 - iii. Inventory.
 - iv. Trade fixtures.
 - v. Tools.
 - vi. Office equipment and furniture.
 - vii. Computer equipment and networks.
 - viii. Household furnishings, appliances, electronics, computer equipment, televisions, stereos, audiovisual equipment, and fixtures.
 - ix. Jewelry, artwork, antiques, and collectibles.
 - x. Clothing.
 - xi. Cash.
 - xii. Precious metals.
- (b) The property's current location.
- (c) The property's purchase price.
- (d) The current fair market value.

- (e) How you acquired an ownership interest or claim in the property.
- (f) Your current ownership interest or claim in the property.
- (g) The identity of any third parties who possess or claim to possess an ownership interest in the property.
- (h) Any debts, liabilities, liens, or other encumbrances against the property.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

37. Identify and produce all documents evidencing your interest in any and all other tangible corporate property, referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

38. Identify and describe all intangible property with a value over \$100 you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period, including:

- (a) The type of intangible property, including but not limited to any and all:
 - i. Contracts.
 - ii. Security agreements.

- iii. Stocks, bonds, or other evidence of ownership, equity, or investment in any business entity, including number of units owned.
- iv. Patents, copyrights, trademarks, or other evidence of intellectual property rights.
- v. Accounts receivable.
- vi. Notes receivable.
- vii. Corporate goodwill.
- viii. Research and development.
- ix. Retirement, pension, 401(k), and IRA accounts.
- x. Annuities.

- (b) A description of the property.
- (c) The property's purchase price (if applicable).
- (d) The current fair market value.
- (e) How you acquired an ownership interest or claim in the property.
- (f) Your current ownership interest or claim in the property.
- (g) The identity of any third parties who possess or claim to possess an ownership interest in the property.
- (h) Any debts, liabilities, liens, or other encumbrances against the property.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

39. Identify and produce all documents evidencing your interest in any and all intangible property, referenced in the foregoing interrogatory. **ANSWER** On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

40. Identify all policies of insurance you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or were covered under during the relevant time period, including:

- (a) The name, address, and telephone number of the insurance company.
- (b) The policy number.
- (c) The policy amount.
- (d) The type of policy.
- (e) The present cash or surrender value.
- (f) The amount of accumulated dividends, if any.
- (g) The time period covered under the policy.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

41. Identify and produce all documents regarding any and all policies of insurance, referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

42. Identify any safe deposit boxes you either rent or have access to currently or during the relevant time period, including:

- (a) The name, address, and telephone number of the entity or person under whose name the safe deposit box is rented.
- (b) The name, address, and telephone number of the financial institution or other entity at which the safe deposit box is located.
- (c) A description of the contents of the safe deposit box as of November 21, 2024.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

43. Identify all revenue, income, or assets you claim exempt from judgment enforcement in this action and state the basis for the exemption.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

44. As to each asset identified by you in response to these interrogatories, identify any third party that currently possesses, owns, or controls that asset, in whole or in part, such as:

- (a) Corporate affiliates, subsidiaries, parent companies, partners, or any other related corporate entity.
- (b) Banks, financial institutions, and brokerage firms.
- (c) Accountants.
- (d) Business partners.
- (e) Friends, family members, and associates with whom you conducted business during the relevant time period.

(f) Other individuals, institutions, and entities that hold your assets.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

45. Identify the asset or assets possessed, owned, or controlled, in whole or in part, by the third parties referenced in the foregoing interrogatory. **ANSWER** On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

46. Identify and produce all documents evidencing the asset or assets possessed, owned, or controlled, in whole or in part, by the third parties referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

47. Identify all transferees of any of your income or assets over the value of \$100, in whole or in part, during the relevant time period, or that are transferees of an ownership interest in any of your income or assets over the value of \$100, in whole or in part, during the relevant time period, including:

- (a) Banks, financial institutions, brokerage firms, and investment firms.
- (b) Accountants.
- (c) Business partners.
- (d) Friends, family members, and associates.
- (e) Other individuals, institutions, and entities.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

48. Identify the income or assets transferred to any third party, referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

49. Identify and produce all documents evidencing transfers of your income or assets to any third party, referenced in the foregoing interrogatory.

ANSWER On the advice of counsel, I invoke my fifth amendment privilege and respectfully decline to answer the question

Dated: November 21, 2024

Attorneys for Plaintiffs

/s/ Joshua J. Voss
Matthew H. Haverstick (No. 85072)
Joshua J. Voss (No. 306853)
Samantha G. Zimmer (No. 325650)
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CERTIFICATE OF SERVICE

I hereby certify that on the date below, I caused a true and correct copy of Plaintiffs' Interrogatories in Aid of Execution Directed to Defendant to be served upon the following counsel of record by email:

Nathan P. Heller, nathan.heller@us.dlapiper.com;
Joseph Roselius, joseph.roselius@us.dlapiper.com; and
Jeffrey S. Torosian, jeffrey.torosian@us.dlapiper.com.

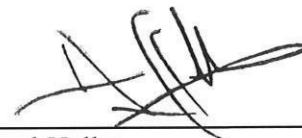
Dated: November 21, 2024

/s/ Joshua J. Voss

VERIFICATION

I, Daryl Heller, understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated:



Daryl Heller